

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

COMPUTE NORTH HOLDINGS, INC., *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 22-90273 (MI)
)
) (Jointly Administered)
)
)

NOTICE OF RECLAMATION CLAIM BY SUNBELT SOLOMON SERVICES, LLC

PLEASE TAKE NOTICE that Sunbelt Solomon Services, LLC (“**Solomon**”) served its written reclamation claim demand (the “**Reclamation Claim**”) upon Compute North Holdings, Inc., Compute North, LLC, and their affiliated debtors and debtors-in-possession (collectively, “**Debtors**”) on October 12, 2022.

PLEASE TAKE FURTHER NOTICE that a copy of the Reclamation Claim and the related exhibit listing all goods delivered by Solomon and received by Debtors within forty-five (45) days of the petition date of September 22, 2022, is attached hereto as **Exhibit 1**. The total value of the goods for which Solomon seeks reclamation is approximately \$3,336,475.49.

PLEASE TAKE FURTHER NOTICE that Solomon hereby provides formal notice to all parties in interest of Solomon’s reclamation claims pursuant to, *inter alia*, Section 546(c) of the Bankruptcy Code and Section 336.2-702 of the Minnesota Statutes for the reclamation of goods sold by Solomon on credit to Debtors.

¹ The Debtors in these Chapter 11 cases, along with the last four digits of the Debtors’ federal tax identification numbers, include: Compute North Holdings, Inc. (4534); Compute North LLC (7185); CN Corpus Christi LLC (5551); CN Atoka LLC (4384); CN Big Spring LLC (4397) CN Colorado Bend LLC (4610); CN Developments LLC (2570); CN Equipment LLC (6885); CN King Mountain LLC (7190) CN Minden LLC (3722); CN Mining LLC (5223); CN Pledgor LLC (9871); Compute North Member LLC (8639) Compute North NC08 LLC (8069); Compute North NY09 LLC (5453); Compute North SD, LLC (1501); Compute North Texas LLC (1883); Compute North TX06 LLC (5921); and Compute North TX10 LLC (4238). The Debtors’ service address for the purposes of these Chapter 11 cases is 7575 Corporate Way, Eden Prairie, Minnesota 55344.

PLEASE TAKE FURTHER NOTICE that Solomon hereby provides formal notice to all parties in interest that this notice is also provided to perfect Solomon's security interest in the goods subject to the Reclamation Claim pursuant to Section 546(b)(2) of the Bankruptcy Code.

PLEASE TAKE FURTHER NOTICE that, as set forth in the Reclamation Claim, Solomon reserves all rights under the Bankruptcy Code, including without limitation section 503(b)(9) thereof with respect to any of the goods identified in the Demand that were delivered within 20 days of the petition date, or to amend this Notice.

DATED: October 12, 2022
Houston, Texas

MAYER BROWN LLP

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Attorneys for Sunbelt Solomon Services, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing instrument was duly served by electronic transmission to all registered ECF users appearing in this case on October 12, 2022.

/s/ Brandon F. Renken
Brandon F. Renken